

UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
SUBREGION 24

INTERNATIONAL SHIPPING AGENCY, INC.,
MARINE TERMINAL SERVICES, INC.,
and TRUCK TECH SERVICES, INC.,
a SINGLE EMPLOYER

and

UNIÓN DE EMPLEADOS DE MUELLES
(UDEM)

24-CA-091723
24-CA-104185
12-CA-129846
12-CA-133402
12-CA-135453
12-CA-135704
12-CA-136480
12-CA-142493
12-CA-143597
12-CA-144073

REQUEST FOR NOTIFICATION OF ANY PROPOSED SETTLEMENT

To the Honorable Administrative Law Judge Robert A. Ringler:

COMES NOW, UNION DE EMPLEADOS DE MUELLES DE PUERTO RICO, INC. (hereinafter referred to as “**UDEM**”), by and through the undersigned attorneys, and respectfully states, alleges and prays as follows:

1. As it has been determined by the Honorable Judge, the fact that there is a controversy between UDEM and the International Longshoremen’s Association (I.L.A.) will not stop the proceedings, nor affect them in any way. Both entities must be notified and kept informed. Nevertheless, the motion filed by the respondents today requesting additional time to present a proposed settlement for approval is troublesome because UDEM has not been informed of said alleged proposal.

2. It is important to bear in mind the instructions that were given to the respondents, which were as follows:

- Respondent's counsel should prepare, and submit, a motion, **which attaches the proposed settlement agreement**, and discusses why he believes that it meets *Independent Stave*. He should also explain, and calculate, what % of backpay allegedly owed the agreement provides. **His motion must, of course, be served upon all parties**, and should be completed and forwarded to judy.bailey@nrlb.gov **by no later than 3 pm, EST on Friday**. I think that it would make the most sense to discuss the motion Monday morning, after everyone has had a chance to review it and think about their positions. As noted, he should make sure to submit the motion ASAP, inasmuch as I'd like to get a chance to review it in depth well in advance of the hearing. (Emphasis ours)

2. UDEM has not received any motion, nor any proposal. UDEM has not been informed of anything that the respondents are now indicating. The record is clear, the Charging Party is not the I.L.A. and if the respondents have unilaterally decided to leave out UDEM, that is against the rules and moreover the instructions given in the instant consolidated cases.

WHEREFORE, it is most respectfully requested an order to the respondents to immediately notify us any "Informal Settlement Offer" and, as ordered by the Honorable Judge, to notify us a copy of the proposed settlement offer, advising the respondents that the herein appearing party cannot be ignored.

RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 10th day of July, 2015.

s/Arturo Figueroa Ríos

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of July, 2015, I have electronically served the instant motion by electronic filing with the NLRB Division of Judges and by electronic mail to: Lilyvette Rodriguez Soto, Esq., Counsel for the General Counsel, National Labor Relations Board, Subregion 24, Isis M. Ramos Meléndez, Esq., Counsel for the General Counsel, National Labor Relations Board, Subregion 24; Antonio Cuevas Delgado, Esq. and Henry P. Gonzalez, Esq., Counsel for the Respondent; Elizabeth Alexander, Esq., Leslie Mardon, Esq. and Vanessa Marzán Hernández, Esq., Counsel for International Longshoremen's Association, as follows:

By electronic filing:

Hon. Robert A. Ringler
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Division of Judges
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